



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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January 4, 2024

**VIA ECF**

The Honorable Sarah L. Cave  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Paul Phillips, et. al. v. The City of New York, et. al., 21 Civ. 8149  
(ALC)(SLC)

Your Honor:

I am a Senior Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing the appearing defendants in the above referenced matter. We write jointly with plaintiffs' counsel in accordance with Your Honor's Order at Docket 144. The parties have conferred and agree as follows: Defendants respectfully request that further discovery be stayed pending the outcome of defendants' motion to dismiss plaintiffs' Third Amended Complaint (and plaintiffs' anticipated motion to strike defendants motion to dismiss), to which plaintiffs have no objection with one exception. The one exception is discovery plaintiffs may seek—and which defendants may oppose-- in order for plaintiffs to serve the defendant Renan Beauchard, who has not yet been served with process.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman  
Mark D. Zuckerman

cc: All counsel (via ECF)